



Proposed Interim Enforcement Policy for
Pilot Program on the Use of Alternative Dispute
Resolution in the Enforcement
Program Request for Comments
(69FR21166)

Nuclear Management Company, LLC

May 20, 2004

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Ms. Annette Vietti-Cook
Secretary
U.S. Nuclear Regulatory Commission
Mail Stop T-6 D59
Washington, DC 20555-0001

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Proposed Interim Enforcement Policy for Pilot Program on the Use of Alternative
Dispute Resolution in the Enforcement Program (69 Fed. Reg. 21166; April 20, 2004)

Nuclear Management Company (NMC), LLC* appreciates the opportunity to comment on the above cited Federal Register notice announcing the implementation of a pilot program on the use of Alternative Dispute Resolution (ADR) in cases involving discrimination or other wrongdoing.

The ADR program, as a component of the NRC's enforcement process, will provide a less adversarial process for resolving the issues in dispute; promote greater communication and cooperation among the parties leading to mutually satisfying end result; help to minimize the time to obtain a resolution of potentially contentious issues; and, lead to a more effective correction action. Through the ADR process the parties will be able to quickly put the dispute behind them and return to productively carrying out their respective professional responsibilities.

NMC shares the views expressed by the Nuclear Energy Institute (NEI) in their comments dated May 20, 2004. NMC endorses the major themes raised in the NEI comments and encourages NRC to consider establishing the program as a permanent part of the enforcement process.


Edward J. Weinkam
Director, Regulatory Services
Nuclear Management Company, LLC

* NMC is the licensed operator of the Duane Arnold Energy Center, Kewaunee Nuclear Power Plant, Monticello Nuclear Generating Plant, Palisades Nuclear Plant, Point Beach Nuclear Plant Units 1 and 2, and Prairie Island Nuclear Generating Plant Units 1 and 2.

700 First Street • Hudson, Wisconsin 54016
Telephone: 715.377.3300

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